

REMARKS

In the Office action dated April 22, 2004, claims 1 – 23 were rejected. In response, claim 1 has been amended and claims 8, 9, and 12 – 23 have been canceled. Applicants hereby request reconsideration of the application in view of the amended claim and the below-provided remarks.

I. Claim Rejections under 35 U.S.C. 103

Claim 1 has been amended to incorporate the limitations of claims 8 and 9. Amended claim 1 recites:

“an image sensor;
a package structure for holding said image sensor, said package structure including attachment means for attaching an optics system to said package structure;
electrical connectors for creating electrical connections between said image sensor and a circuit board;
a transparent cover connected to said package structure that encloses said image sensor within a cavity of the package structure; and
a removable protective barrier, connected to said attachment means, that protects said transparent cover from damage.” (emphasis added)

Original claim 9 added the limitation of the “removable protective barrier.” Claim 9 was rejected under 35 U.S.C. 103(a) as being unpatentable over Takachi (U.S. Patent Application Publication No.: 2003/0137595) in view of Crespiatico et al. (U.S. Patent No.: 5,007,854 hereinafter Crespiatico). The Office action states that “Takachi fails to disclose a removable protective barrier, connected to said attachment means, that protects said transparent cover from damage.” As the basis of the obviousness rejection, the Office action states that Crespiatico discloses the use of “a removable protective barrier, connected to said attachment means, that protects said transparent cover from damage” and that the Crespiatico disclosure suggests a modification of the Takachi device to include a removable protective barrier as recited in amended claim 1.

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Crespiatico does not teach or suggest "a removable protective barrier, connected to said attachment means, that protects said transparent cover from damage"

Crespiatico teaches "a locking device for printed circuit board connectors" (col. 1, lines 46 – 47) that prevents two circuit board connectors from separating when one of the circuit boards is pulled away from the other circuit board. (emphasis added) Referring to Fig. 1 of Crespiatico, the purpose of the locking device (3) is to prevent the connectors (1) and (2) from separating when a force (F2) is applied to one of the connectors. Specifically, at col. 2, lines 44 – 48, Crespiatico teaches that the locking device is used "[t]o avoid a force exerted on board 6 in the direction of arrow F2 (which force may occur when the pair of boards 6, 13 has to be pulled out of a housing, not shown) which may cause the disconnection of the two connectors." (emphasis added) That is, Crespiatico teaches a locking device that prevents two connectors from separating.

In contrast to the statements made in the Office action, and as clearly shown above, the locking device taught by Crespiatico is used to prevent the "disconnection of the two connectors" not to protect the connectors from damage. Nowhere does Crespiatico teach or suggest that the locking device is provided to protect the connectors from damage. Further, nowhere does Crespiatico teach or suggest that the locking device is provided to protect a transparent cover from damage as recited in claim 1. In sum, while Crespiatico does disclose a locking device that prevents two circuit board connectors from separating, Crespiatico does not teach or suggest a removable protective barrier that protects a transparent cover from damage as recited in amended claim 1. Therefore, because Crespiatico does not teach or suggest "a removable protective barrier, connected to said attachment means, that protects said transparent cover from damage" as recited in amended claim 1, Crespiatico does not provide the requisite teaching or suggestion to support a *prima facie* case of obviousness.

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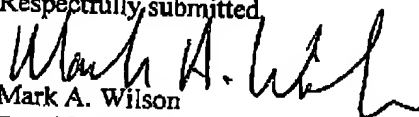
II. Canceled Claims

Claims 8 and 9 have been canceled in view of the amendment to claim 1.
Claims 12 - 23 have also been canceled.

Applicants respectfully request reconsideration of the claims in view of
the remarks made herein. A notice of allowance is earnestly solicited.

Date: July 22, 2004

Respectfully submitted,


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